

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MORGAN JONES, Individually, and on
Behalf of All Others Similarly Situated,)
Plaintiff,) Civil Action No. 2:11-cv-06910
v.)
JUDGE TECHNICAL SERVICES, INC.,) Judge Mitchell S. Goldberg
Defendant.) ORAL ARGUMENT REQUESTED

DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, and for the reasons expressed in the accompanying Memorandum of Law, which is incorporated herein by reference, Defendant Judge Technical Services, Inc. (“Judge”) moves for partial summary judgment and respectfully requests that the Court grant judgment in its favor and against Plaintiff Morgan Jones as to Mr. Jones’s claim under the Fair Labor Standards Act to the extent that it asserts a minimum wage-based theory of liability, as to Mr. Jones’s claim for retaliation, and as to Judge’s counterclaim for fraud.

Dated: January 23, 2013

/s/ Matthew J. Hank
Matthew J. Hank (PA #86086)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of January, 2013, I electronically filed the foregoing document with the Clerk of the Court using ECF. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Shelby R. Schwartz
Shelby R. Schwartz